

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WHITEAMIRE CLINIC, P.A., INC.,)	
Plaintiff)	
)	
v.)	Case. No.: 1:24-cv-06753
)	
CARTRIDGE WORLD NORTH)	
AMERICA, LLC,)	
Defendant)	

MOTION FOR TURNOVER

NOW COMES Plaintiff, WHITEAMIRE CLINIC, P.A., INC. (“Whiteamire”), by and through its attorney, Ross M. Good, and petitions this honorable Court to direct COMPUTER CORNER, LLC (“Computer Corner”), a third-party respondent, to turn over all monies within control or possession that are currently due and owing to Defendant.

1. In August 2024, Computer Corner was served with a Citation to Discover Assets with regard to the instant matter. (Doc. 4).
2. Computer Corner is a franchisee of Defendant, and, pursuant to its franchise agreement with Defendant, pays monthly royalties to Defendant.
3. In its Answer to the Third-Party Respondent Citation, Computer Corner certified that it was currently freezing \$3,854.97, the amount due that month to be paid to Defendant. A copy of Computer Corner’s Answer to the Third-Party Respondent Citation is attached hereto as **Exhibit 1**.
4. Concurrently with this Motion, Plaintiff has filed a Motion to Appoint a Receiver to accept receipt of all monies turned over by Computer Corner.

WHEREFORE, Plaintiff respectfully requests that Computer Corner be directed to turn over, within five days of the entry of an order appointing a Receiver, the amount currently frozen in its account to that Receiver and all future amounts due to Defendant Cartridge World North America, LLC.

Respectfully submitted,

Respectfully Submitted,
Whiteamire Clinic P.A., Inc.
Plaintiff,

/s/Ross M. Good
One of Plaintiff's Attorneys

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